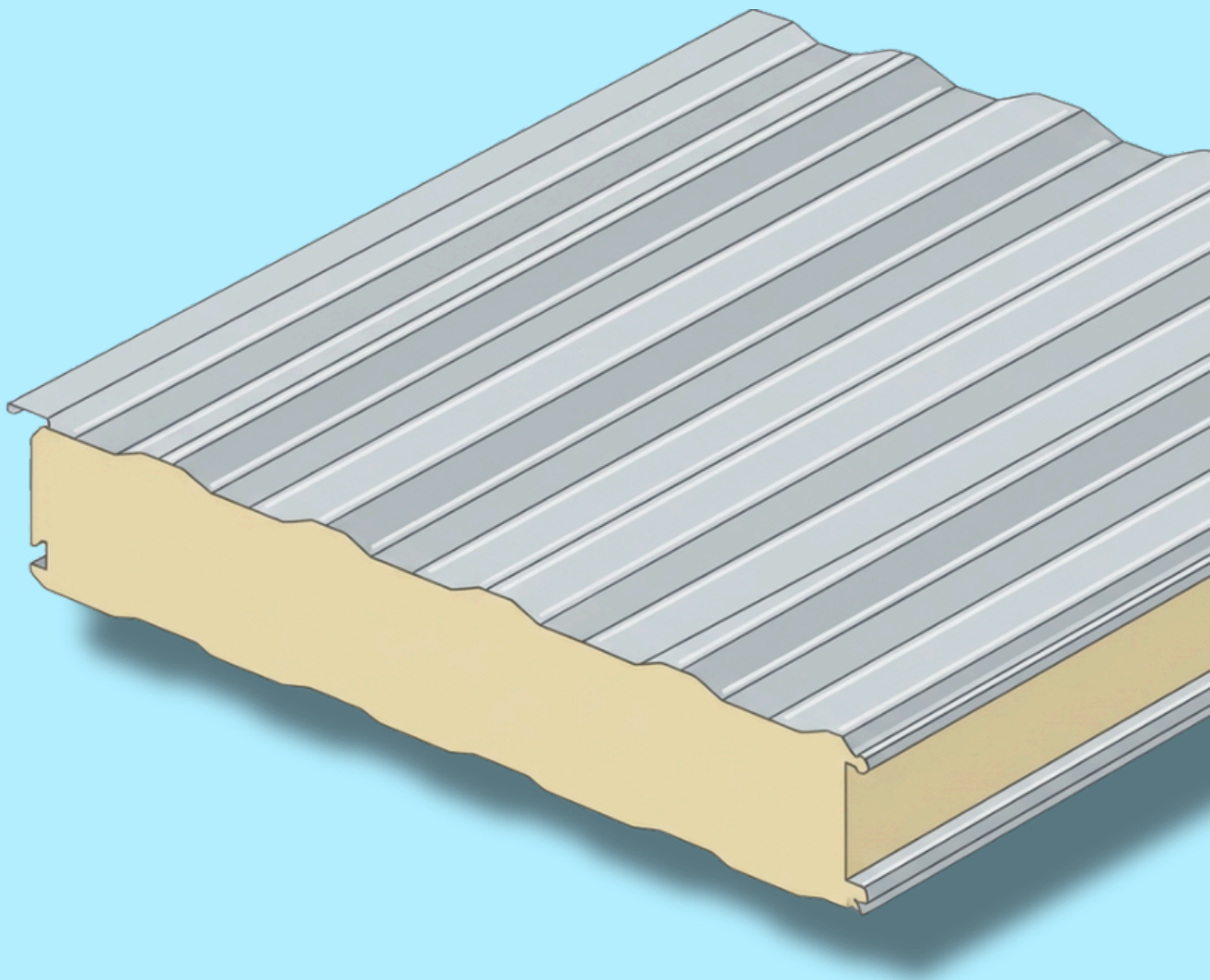




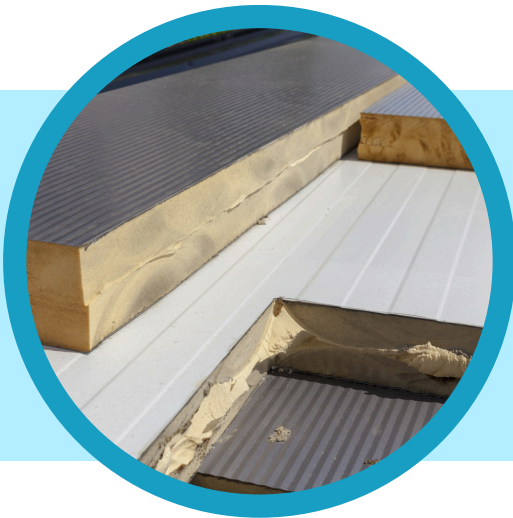
Insulation Panel Disposal Guide

What every contractor needs to know about compliant insulation panel disposal in 2026





Insulation Panel Disposal Guide



Time to Read

10 minutes. Everything you need to make a confident, informed decision about your insulation panel disposal.

01. WHO THIS IS FOR

Contractors, site managers, procurement teams, and FM professionals involved in demolition, refurbishment, or strip-out projects.

02. WHAT IT COVERS

Panel identification, ODS classification, legal requirements under the Hazardous Waste Regulations, documentation, and a compliance checklist.





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Who Does This Apply To?

This guide is relevant if you are involved in any of the following:

- Demolishing or refurbishing a building that uses insulated panel cladding on its roof or walls
- Removing cold store panels, food processing linings, or internal compartment walls
- Managing or procuring a contractor to carry out this kind of work
- Signing waste transfer documentation on behalf of a site or organisation

Industry Note

The EPIC Guide (Insulated Panels: Identification, End of Life and Re-use Options, June 2022) notes that relatively few metal-faced insulated panels have entered the waste stream to date, meaning many contractors have had limited experience of how to dispose of them correctly.

2. Why Panel Age Matters

The single most important compliance factor for insulation panel disposal is whether the panel contains Ozone Depleting Substances (ODS). This depends entirely on the age and core type of the panel. There are three key eras to understand:

Pre-1994 panels

Likely to contain Chlorofluorocarbon (CFC) blowing agents. CFCs are classified as ODS and carry the strictest regulatory requirements. These panels must be treated as hazardous waste.

Approximately 1994–2003

This era saw a transition to Hydrochlorofluorocarbon (HCFC) blowing agents. HCFCs carry approximately 10% of the ozone-depleting potential of CFCs but are still classified as ODS. Both CFC and HCFC panels require specific treatment at end of life and must be treated as hazardous waste.

From 2004 onwards

All panels produced in the UK since 1 January 2004 are PIR pentane-blown and are non-ODS and non-hazardous under current hazardous waste regulations. Standard duty of care applies.



HFC PANELS - A NOTE

Some panels produced between approximately 2000 and 2004 used Hydrofluorocarbon (HFC) blowing agents. These are not classified as hazardous waste under ODS regulations. However, HFC panels contain gases with a Global Warming Potential (GWP) above 150, which must be noted on the waste transfer documentation. Normal recycling or shredding is appropriate for HFC panels provided the foam is reduced to pellet size rather than dust.

Source: EPIC Guide, Section 1.3.



3. How to Identify Your Panel Type

Intro

You must identify the panel type before disposal begins. You cannot determine whether a PUR or PIR panel contains CFC or HCFC blowing agents by visual inspection alone. Here's a three-step identification process:



Practical rule

The EPIC Guide notes that panels with an external thickness of 30mm or 35mm were almost certainly produced before the 1990s and are likely to contain ODS. Beyond that, thickness alone is not a reliable guide.



Is it actually an insulated panel?

Insulated panels are often confused with site-assembled cladding systems, which are treated differently. Insulated panels typically have a flat or micro-rib internal face. Site-assembled systems tend to have a deeper profiled liner of around 20mm or more.



What is the core material?

The core material determines how the panel must be disposed of. PUR or PIR rigid foam is the most common for external roofs and walls - over 90% of external panels use one of these, and age is critical for this type. Mineral Wool (MW) panels are not classified as ODS. Polystyrene (EPS or XPS), used mainly in cold stores, is not classified as ODS. Phenolic foam (PF) is rare and used on specific internal applications.



If it is PUR or PIR - was it made before 2004?

You cannot visually identify whether a PUR or PIR panel was manufactured before or after 2004. Check building records, CDM Health and Safety files, or architect and contractor records. Check panel markings - most post-2004 panels have manufacturer, date, and core type marked on joint tape or UV-marked on the face. Contact the manufacturer using any available markings. Arrange physical testing if no records are available.

4. The Legal Framework

The key legislation governing hazardous insulation panel disposal in England and Wales is The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894), as amended.



No on-site crushing.

ODS-containing panels cannot be crushed or shredded on the demolition site under any circumstances.



Hazardous Waste Consignment Notes required.

The movement of hazardous waste must be tracked using consignment notes - a formal record of who produced the waste, who transported it, and where it went.



ODS recovery facilities only.

Processing must go through facilities equipped to recover ODS. Verify that the facility you use holds a permit that allows it to accept the specific panel type you are disposing of.



Duty of care sits with the waste producer

The legal responsibility for correct classification and documentation lies with whoever produced the waste - not the waste carrier.



Important

If you cannot identify the panel type, the EPIC Guide recommends contacting the manufacturer, checking CDM files, or arranging physical testing. Do not guess or leave the classification blank. Duty of care regulations require the waste producer to properly describe their waste.

5. Panel Classification at a Glance



Use this table to identify your panel type and understand the disposal requirements that apply.

Panel Type	ODS Status	Hazardous?	Key Requirement
PIR/PUR - post-2004 (pentane)	No ODS	No	Standard duty of care. Waste Transfer Note required. Licensed carrier. Permitted facility.
PIR/PUR - 2000–2003 (HFC)	Not ODS - F-Gas applies	No - note GWP	Note GWP >150 on transfer documentation. Normal recycling or shredding appropriate.
PUR - 1994–2000 (HCFC)	ODS (HCFC)	Yes	Hazardous Waste Consignment Note required. ODS recovery plant only. No on-site crushing.
PUR - pre-1994 (CFC)	ODS (CFC) - highest ODP	Yes	Hazardous Waste Consignment Note required. ODS recovery plant only. No on-site crushing.
Mineral Wool (MW)	No ODS	No	Standard duty of care. Waste Transfer Note required. Licensed carrier. Permitted facility.
Polystyrene (EPS/XPS)	No ODS	No	Standard duty of care. Waste Transfer Note required. Licensed carrier. Permitted facility.



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What Your Waste Transfer Documentation Must Say

Your waste transfer note or consignment note must accurately describe the waste. Based on the Hazardous Waste (England and Wales) Regulations 2005, the following must be included:

- Whether the panel contains ODS - specifically CFC or HCFC blowing agents
- If HFC-blown - note that the panel contains gases with a GWP above 150. The EPIC Guide states this should be clearly referenced on the waste transfer note
- The core type (PUR, PIR, MW, EPS, XPS, etc.) if known
- Whether the panel is pre- or post-2004, if determinable
- The name and permit details of the facility processing the waste

GAP Group

As a licensed AATF, GAP Group processes insulation panels directly and issues consignment notes and certificates from the facility that treated the waste. There are no additional steps in the chain.

Pre-Disposal Compliance Checklist

Panel Identification	✓
Confirmed the cladding system is an insulated panel, not a site-assembled cladding system	
Identified the core material type (PUR/PIR, Mineral Wool, Polystyrene, or Phenolic)	
Checked CDM files, building records, or panel markings to establish panel age	
If PUR or PIR - confirmed whether panels are pre- or post-2004	
If panel age cannot be confirmed - contacted the manufacturer or arranged physical testing	
Hazardous Classification	✓
Confirmed whether panels contain CFC or HCFC blowing agents (pre-2004 PUR/PIR)	
Confirmed whether panels are HFC-blown (note GWP >150 on documentation if applicable)	
Panel classification recorded - do not leave blank or estimate	
Waste Carrier and Facility	✓
Waste carrier is a registered carrier - verified on the Environment Agency public register	
Processing facility holds the correct permit for the specific panel type	
For ODS panels - confirmed processing facility is an ODS recovery plant	

Pre-Disposal Compliance Checklist

Documentation	✓
For ODS (hazardous) panels - Hazardous Waste Consignment Note obtained, not a standard WTN	
For HFC panels - GWP above 150 referenced on the waste transfer documentation	
For non-hazardous panels - standard Waste Transfer Note issued with accurate waste description	
Documentation includes core type, ODS status, and facility permit details	
Documentation retained in project records - minimum 3 years for hazardous waste consignment notes	
On-Site Operations	✓
For ODS-containing panels - confirmed no on-site crushing or shredding will take place	
Site team briefed on panel type and disposal requirements before clearance begins	

Not sure?

GAP Group can advise on panel identification and documentation requirements before your project starts. We process insulation panels directly at our licensed AATF facility and issue certificates from the facility that treated the waste. Call us on 0191 438 6438 or visit [gapgroupuk.com](https://www.gapgroupuk.com).



Need Help With Insulation Panel Disposal?

GAP Group is a licensed AATF. We collect, process, and document insulation panel disposal directly - hazardous and non-hazardous - with full certification issued from the processing facility. Our own fleet, no brokers, no additional steps in the chain.

[Speak to an Expert](#)

About GAP Group



GAP Group is a licensed Approved Authorised Treatment Facility (AATF) providing nationwide WEEE collection, licensed treatment, and complete compliance documentation for contractors, developers, FM teams, housing associations, and businesses across the UK.

We own the entire process from collection to certification- containers supplied on site, collections coordinated using our own haulage fleet, and treatment carried out directly at our licensed AATF facility.

Our services cover the full range of electrical and specialist waste streams: Fridges and cooling, small mixed WEEE, vapes, displays, lamps, batteries, and insulation panels - hazardous and non-hazardous. For data-bearing assets we provide certified data destruction in line with UK GDPR requirements.

Contact Us



gapgroupuk.com



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